Exhibit 2

contractors, LLC

Human Resources

2022 Policy Guide

Contacts

Paula Delgado Rubio

CFO

Email: pdelgado@ferrovial.us Phone: (972) 890-3848

Hannah Shaw

Human Resources Coordinator Email: hpotter@ferrovial.us Phone: (404) 314-6348

Arelis Ramirez

Human Resources Coordinator Email: aramirez@ferrovial.us Phone: (470) 312-6216

Joaquin Losada Lopez

CEO

Email: jlosada@ferrovial.us Phone: (972) 922-5095

Claudine Biaggi

Payroll Manager

Email: cbiaggi@ferrovial.us Phone: (817) 717-1775

Nicole Shaw

Payroll Administrator Email: nshaw@ferrovial.us Phone: (470) 363-7229

Javier Torroja

Construction Manager Email: jtorroja@ferrovial.com Phone: (470) 637-0810

Michael Valdes

Human Resources Manager Email: mvaldes@ferrovial.us Phone: (404) 368-8472

Jedidiah Cochran

Associate General Counsel Email: jcochran@ferrovial.us Phone: (404) 317-5883

Contents

Introduction	1	Time Off	5
Safety & Health	2	Assets	7
Staffing & Employment	3	Employee Relations	8
Compensation Administration	4	General Management Practices	9

Introduction

Disclaimer

Welcome to North Perimeter Contractors, LLC ("NPC, LLC"). Our Employees are the backbone of the NPC, LLC's operation. Our Policy Guide (the "Manual") is designed to provide you with a full range of general information, which will be useful during your career with NPC, LLC.

The contents of this Manual present a summary of NPC, LLC's programs and policies and are intended as guidelines only. Unless otherwise stated, the provisions of this manual apply to all NPC, LLC Employees. Seconded Employees are to follow all policies herein related to conduct and safety while assigned to NPC, LLC, but shall fall under their own company's benefits and compensation policies. The Employee should be aware that these policies and programs may be amended at any time, and, depending upon the particular circumstances of a given situation, NPC, LLC's actions may vary from the written policy.

NPC, LLC will notify employees of significant changes, modifications, and revisions through internal e-mail correspondence. The most current employee handbook will be maintained in the Finance Department and will be found on the HRIS portal used for payroll, new hire onboarding, and time keeping.

Employment At Will

Employment with NPC, LLC is at-will. No manager, supervisor, or other individual of NPC, LLC has authority to make a commitment of guaranteed permanent or continuing employment for any specified period of time and no document or publication of NPC, LLC, including this Manual, should be interpreted to make such a guarantee.

Orientation Period

NPC, LLC strives to hire the most qualified individuals for each position. We will provide the necessary orientation and training, including safety training, for the position and level of experience required, and answer any questions new hires may have. Each Employee will be on an introductory period for 90 calendar days. Completion of the introductory period and satisfactory or good performance does not guarantee continued employment or wage adjustment. Both during and after the introductory period, employment with NPC, LLC is "at-will" and may be terminated by either the Employee or NPC, LLC at any time, with or without cause.

Safety & Health

Safety Policy

Safety on the job at NPC, LLC will not be compromised and is of the foremost importance. It is the policy of NPC, LLC to provide and maintain standards of safety, health and environment in accordance with Federal, State and Local Laws and Regulations.

Observing the rules set out in the NPC, LLC Safety Policy is everyone's responsibility. The Safety Policy and others are available to all employees electronically on the shared resources server. Employees are required to become familiar with these rules prior to commencing work and comply with them at all times. All Employees and management will share the responsibility for fostering safe and healthful work practices and concern for fellow workers. Employees are expected to observe all safety precautions, wear prescribed safety articles, and use protective equipment as required. When specific work instructions are not available, Employees are expected to use sound safe judgment and consult a supervisor. Under no circumstances is an Employee permitted to violate any safety requirement, risk their personal safety, or the safety of others in completing their work.

Substance Abuse - Drug & Alcohol

It is the intention of NPC, LLC to provide a drug-free, healthful, safe and efficient workplace in every facility of NPC, LLC. Each Employee shares the responsibility to maintain this environment for the benefit of all Employees as well as to enhance NPC, LLC's success in providing high quality services to customers. While on any NPC, LLC premises or works site, and while conducting business-related activities of NPC, LLC, no Employee may use, possess, sell, manufacture, distribute, dispense, conceal, receive, transport, or be under the influence (including the presence of detectable levels or identifiable trace quantities) of any of the following items or substances: Illegal drugs, controlled substances, marijuana, intoxicants (legal or illegal), "look-alike" substances, designer drugs, counterfeit or synthetic drugs, inhalants, and any other drugs or substances that will, in any way, affect safety, work ability, alertness, coordination, judgment, response, or the safety of the Employee others on the job. Consuming alcoholic beverages while driving a NPC, LLC vehicle or driving any vehicle for NPC, LLC business while intoxicated is prohibited. The consumption of alcohol on NPC, LLC time or on NPC, LLC property or work site is prohibited.

Drug Screening

To ensure compliance with the above rules, employees and applicants for employment shall be subject to drug screening as follows:

- Applicants: Prior to employment, each applicant will undergo a drug screening. Applicants who test positive will not be considered for employment.
- Behavior Indicated: When there is reason to suspect an employee's behavior raises a reasonable suspicion of drug and/or alcohol use, the employee will be required to undergo a drug and/or alcohol screening.
- Post-Accident/Incident: An employee who sustains a job-related injury requiring medical attention or whose performance contributed to an incident will be required to undergo a drug and/or alcohol screening.
- Periodic Random Testing: NPC, LLC's employees will be subject to periodic, unannounced, random drug and/or alcohol screening.
- Government or Client/Owner Mandated: In addition to the above, employees are required to submit to the Government, Client/Owner Mandated drug and/or alcohol testing to the extent that they are required to do so.
- Truck Drivers: Drivers of commercial vehicles or of any vehicle requiring hazardous material placards are also subject to the Drivers Drug and Alcohol Policy (50% of this trade group will be sampled annually in accordance with applicable regulations).

Workplace Violence & Threat Management

It is the intention of NPC, LLC to provide a safe and secure workplace at all work locations. While NPC, LLC strives to offer its Employees a safe workplace environment, it is just as important for each Employee to take personal precautions for their own safety, as well as their duty to report any crime or circumstances that may lead to violent acts and to cooperate with authorities when investigating any such crime. Measures to prevent and defuse workplace violence include: follow and enforce the NPC, LLC safety and security rules, take sensible personal precautions to discourage

Case 1:25-cv-00804-LMM Document 1-2 Filed 02/14/25 Page 4 of 14

such cases, if confronted in a situation where you feel uncomfortable or the potential for a violent situation may occur, deal calmly and politely with the person and report all such incidences immediately to Security, Safety Team Staff and/or Human Resources Department and cooperate with the authorities.

Safe Driver Requirements

It is the policy of NPC, LLC to promote accident-free performance by encouraging safe driving for all Employees who will drive a vehicle as any part of fulfilling their assigned job responsibilities. This will be accomplished through education and regular review of motor vehicle records. A motor vehicle record may be reviewed prior to hiring a potential Employee. All Employees who will drive a vehicle, whether personally owned or assigned, as any part of fulfilling their assigned responsibilities, may have their motor vehicle records reviewed at any time. Violations listed on an motor vehicle record vary from state to state. Please see NPC, LLC's "Policy for the Use of Employer-Provided Vehicles & Fuel Card" for more detail.

Staffing & Employment

Employment of Individuals with Disabilities

It is NPC, LLC's policy that all Employees have a right to work in a quality environment that is free from any type of unlawful discrimination. NPC, LLC will not tolerate any form of unlawful discrimination toward protected disabled persons.

Equal Employment Opportunity

NPC, LLC provides equal employment opportunity to all Employees and applicants for employment without regard to race, color, religion, gender, national origin, age, disability, marital or veteran status or other characteristics protected by applicable law. It is the operating policy of NPC, LLC to afford all persons equal employment opportunity without regard to their race, color, religion, national origin, disability, age and sex. The following is our EEO Policy:

"It is the policy of NPC, LLC to assure that applicants are employed, and that Employees are treated during employment, without regard to their race, color, religion, national origin, disability, age ,sex, or disability. Such action shall include: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, pre-apprenticeship, and/or on-the-job training."

All present Employees are requested to encourage any individual, male or female, regardless of race, color, religion, national origin, disability, age or sex to make application for employment with NPC, LLC or apply for training under available programs.

Michael Valdes

Equal Employment Opportunity Officer

Telephone: (404) 368-8472

Equal Employment Opportunity Policy

Purpose

NPC, LLC provides equal employment opportunity to all Employees and applicants for employment without regard to race, color, religion, gender, national origin, age, disability, marital or veteran status or other characteristics protected by applicable law.

NPC, LLC also recognizes that diversity in the workplace promotes the development of quality decisions and optimal solutions to customer requirements. To this end, NPC, LLC will endeavor to employ women and minorities at all levels of the organization and to remove artificial barriers to the selection, development, promotion and retention of qualified Employees. NPC, LLC will endeavor to employ strategies that allow individuals to distinguish themselves through their performance and achievements.

Scope

This policy applies to all aspects of employment including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, benefits, tuition assistance, social and recreational programs and training, and it will be administered in accordance with applicable government laws and regulations.

All employment decisions at NPC, LLC will be based on established, valid, job related, non-discriminatory criteria such as merit, performance qualifications and abilities as well as equal opportunity principles. Also, NPC, LLC will make reasonable accommodations for qualified individuals with known disabilities in accordance with appropriate laws and regulations.

Procedures

- A. While senior management is responsible for overall compliance with this policy, each manager, supervisor and Employee is also responsible for ensuring implementation and compliance with this policy.
- B. All Employees, including supervisors and managers, are expected to comply with NPC, LLC's policy on non-discrimination.
- C. Any person found to be engaging in unlawful discrimination or reprisals against Employees raising issues of discrimination will be subject to disciplinary action, up to and including termination.
- D. An Employee with questions or concerns about unlawful discrimination in the workplace is encouraged to bring these issues to the attention of his or her manager, supervisor or the Human Resources Manager.
- E. If an Employee is uncomfortable about reporting an alleged incident of a discriminatory nature within his or her own organization or is dissatisfied with the outcome of a complaint reported, the Employee is encouraged to contact higher levels of management and/or the Human Resources Manager.
- F. NPC, LLC may be required or may otherwise choose to develop individual equal employment opportunity plans to pursue aggressive and proactive policies and actions to achieve NPC, LLC's non-discriminatory purposes.

A statement consistent with the principles of this policy and applicable equal employment opportunity policies will be placed on NPC, LLC bulletin boards. Abstracts of this policy may be noted on employment applications, employment advertising, purchase orders and other such instruments which represent NPC, LLC to the outside world and internally.

Immigration Law Compliance

NPC, LLC is committed to employing only United States citizens and aliens who are authorized to work in the United States. At the same time, NPC, LLC does not unlawfully discriminate on the basis of citizenship or national origin. In this regard, NPC, LLC complies with the Georgia Security and Immigration Compliance Act and the Immigration Reform and Control Act of 1986, which, in part, requires that a valid Form I-9 be on file.

NPC, LLC is an E-verify employer.

Compensation Administration

Pay Schedule

The pay week is Monday through Sunday with payment occurring on the following Friday. Employees working directly on DOT projects are required to be paid on a weekly basis. For employees not working directly on DOT projects, NPC, LLC reserves the right to pay either weekly or monthly.

Time Sheets

Employees paid at an hourly rate are required to submit a time sheet to their direct supervisor at the end of every week. Supervisors must submit all time sheets to the CFO by noon of the first business day of the following week. Failure to turn in time could result in delayed payment until the next payroll cycle. Time sheets must accurately reflect hours worked. A hard copy of a time sheet, or direction on how to submit time through the electronic time and attendance system, may be obtained through your supervisor, department manager, or NPC, LLC's CFO.

Overtime Pay

Overtime must be approved in advance by employee supervisor. It is the policy of NPC, LLC to pay non-exempt Employees for approved overtime in accordance with the Federal and State Wage and Hours Law. All non-exempt Employees will be compensated for hours worked in excess of 40 hours in one work week at one and one-half their base rate of pay in effect at the time. All Paid Time Off, Floating Holidays, Holiday Pay and any other pay without work are not used in the calculation of overtime.

Direct Deposit

Employees are encouraged to utilize direct deposit for payroll. If an Employee is unable to provide banking information for direct deposit, NPC, LLC may issue the Employee a debit card. Deposits will be made onto this card's account in the event that an Employee is unable to or do not wish to provide direct deposit information.

Salary Advances

NPC, LLC does not permit advances on paychecks or against accrued paid time off.

Salary Increases

Salary increases are based upon a combination of factors, such as merit and business performance. A merit increase represents a reward for outstanding performance. All salary increases are at the discretion of the NPC, LLC and are not guaranteed.

Employee Classification

- Full-time employees are those individuals regularly scheduled to work a thirty plus (30+) hour work week. Full time employees are eligible for benefits. Eligibility for certain benefits for a full-time employee may vary if the employee is an expatriate for whom different country regulations may apply.
- Part-time employees are those individuals regularly scheduled to work less than thirty (30) hours per week. Part-time employees who occasionally work more than 30 hours per will not be eligible for full-time employee benefits. Part-time employees may be paid on an hourly basis for hours worked.
- Internship and co-op workers fulfill a hands-on learning experience through a work program with NPC, LLC. This program will be structured around certain internship requirements. Intern and co-op works are not eligible for benefits.
- Temporary workers may work any number of hours up to and including full-time and are generally hired through temporary or placement agencies due to heavy workloads, special projects, or when a regular, full-time employee is on a leave of absence. Temporary workers do not participate in or receive benefits. No employment relationship will exist with NPC, LLC and any temporary workers.
- Non-exempt employees are covered by overtime provisions of the Federal Fair Labor Standards Act and any applicable state laws. Non-exempt employees are entitled to overtime pay for work in excess of 40 hours per week or as dictated by state law.
- Exempt employees are exempt from overtime provisions of the Federal Fair Labor Standards Act policy and any applicable state laws.
 These employees include those who qualify as exempt administrative, executive or professional employees.
- Contractors are individuals who provide specialized or niche expertise/service to NPC, LLC on a project basis. Contractors are accountable for specific deliverables or results. Payment for service rendered is based on the project. Independent contractors must meet certain legal and tax requirements in order to qualify for this designation. Contractors do not participate or receive benefits.

Time Off

Paid Time Off

It is the policy of NPC, LLC to provide and encourage opportunities for rest, relaxation, and personal pursuits, as well time off when ill, by providing Paid Time Off ("PTO") as provided below. NPC, LLC considers this time of rest to be valuable, and Employees are encouraged to use all the PTO time that they are granted each benefit year.

Only active, full-time employees in the groups below are eligible for PTO. PTO is accrued based on eligibility and completed service as specified below:

PTO Eligibility

Group 1 – Salaried and Non-Exempt Administrative Employees

Group 2 - Selected skilled Non-Exempt Hourly Employees

Group 3 – All Employees not classified in Group 1 or Group 2 – Not eligible for PTO and Floating Holidays

Employees who have completed two (2) consecutive months of service, and who are classified in either Group 1 or Group 2 are eligible for PTO.

Annual Award of PTO

PTO is awarded January 1of each calendar year. Typically, and as a rule, employees are awarded sixteen (16) days of PTO per calendar year. The specific amount of PTO awarded to an Employee, along with the proration for during the Employee's first year with the NPC, LLC, will be specified in the Employee's offer of employment. Floating Holidays will be treated the same as PTO. Floating Holidays are designed to give coverage for holidays outside of the normal holiday schedule and to cover the employee during unforeseen extended office closures.

Start Date Month	Days/Hours of PTO	Floating Holidays
January	16 Days (128 hours)	3 Days (24 hours)
February	14.6 Days (117 hours)	2.5 Days (20 hours)
March	13.3 Days (107 hours)	2.5 Days (20 hours)
April	12 Days (96 hours)	2 Days (16 hours)
May	10.6 Days (85 hours)	2 Days (16 hours)
June	9.3 Days (75 hours)	2 Days (16hours)
July	8 Days (64 hours)	1.5 Days (12 hours)
August	6.6 Days (53 hours)	1.5 Days (12 hours)
September	5.3 Days (43 hours)	1 Day (8 hours)
October	4 Days (32 hours)	1 Day (8 hours)
November	2.6 Days (21 hours)	0 Days (0 hours)
December	1.3 Days (11 hours)	0 Days (0 hours)

PTO and Floating Holidays will be prorated to the eligibility date of the first year of employment. The table below is an example of PTO and Floating Holiday proration for the first year for an Employee receiving sixteen (16) days of PTO per calendar year. All unused PTO and Floating Holidays will be forfeited on December 31 of each calendar year.

Unused PTO and Floating Holidays at Separation

NPC, LLC will pay out a maximum of 10 days (80 hours) of unused PTO in the event of separation provided that:

- 1. At least six (6) consecutive months of service have been completed;
- 2. The separation is voluntary; and
- 3. A written notice is tendered to the NPC, LLC with an acceptable amount of time from the date that the notice is given until the final date to be worked. In most cases, two (2) weeks' notice is sufficient, though more notice may be considered acceptable for manager or other key positions within the organization.

Floating Holidays will not be paid out upon separation.

Requesting and Using PTO and Floating Holidays

All PTO and Floating Holidays must be requested in advance when foreseeable, and all requests should be submitted using the "Vacation Request" tab in NPC, LLC's electronic time and attendance system. When PTO or Floating Holidays cannot be foreseen, it must be documented upon return to work. Immediate supervisors should be notified with as much notice as possible when unforeseen PTO or Floating Holidays will be taken.

PTO and Floating Holiday requests submitted through the electronic time and attendance system should be directed through a workflow to include Employee's Department Manager (if applicable) as well as the NPC, LLC's CFO, VP of Construction and CEO.

Employees are encouraged to use PTO in a minimum of ½ day (4 hour) increments. PTO should be used for either a full morning, or afternoon. Examples for PTO use are:

- 8:00 AM to 12:00 PM
- 1:00 PM to 5:00 PM
- 8:00 AM to 5:00 PM

Holidays

The following are the holidays recognized by NPC, LLC. At the beginning of each calendar year, or near the conclusion of the previous year, a memorandum will be distributed to all employees listing the specific days on which each holiday will be celebrated.

Hall days	
Holiday	
New Year's Day	
Memorial Day	
Independence Day	
Labor Day	
Thanksgiving	
Day After Thanksgiving	
Christmas Eve	
Christmas Day	
New Year's Eve	

Holiday pay is not to be considered when determining hours worked in the computation of overtime. Employees are not allowed holiday pay while in an out-of-pay status such as FMLA leave or while receiving short-term disability payments.

Family and Medical Leave Act (FMLA)

The Family and Medical Leave Act (FMLA) provides certain employees with up to 12 weeks of unpaid, job-protected leave per year. It also requires that their group health benefits be maintained during the leave. FMLA is designed to help employees balance their work and family responsibilities by allowing them to take reasonable unpaid leave for certain family and medical reasons. It also seeks to accommodate the legitimate interests of employers and promote equal employment opportunity for men and women.

FMLA applies to all public agencies, all public and private elementary and secondary schools, and companies with 50 or more employees. These employers must provide an eligible employee with up to 12 weeks of unpaid leave each year for any of the following reasons:

- For the birth and care of the newborn child of an employee
- For placement with the employee of a child for adoption or foster care
- To care for an immediate family member (spouse, child, or parent) with a serious health condition
- To take medical leave when the employee is unable to work because of a serious health condition

Case 1:25-cv-00804-LMM Document 1-2 Filed 02/14/25 Page 8 of 14

Employees are eligible for leave if they have worked for their employer at least 12 months, at least 1,250 hours over the past 12 months, and work at a location where the NPC, LLC employs 50 or more employees within 75 miles. Whether an employee has worked the minimum 1,250 hours of service is determined according to FLSA principles for determining compensable hours or work.

Your rights under FMLA can be reviewed in the break areas of the main building on the bulletin boards of employment rights posters, as well as several job-site trailers and facilities.

To review the NPC, LLC's complete FMLA policy and process, please contact Human Resources.

Funeral & Bereavement Leave

Regular full-time Employees are eligible for paid funeral leave. Regular part-time Employees are not eligible. In the event of a death of an immediate family member (defined for the purpose of this Policy Guide as a spouse, parent, child, grandparent or sibling), up to three (3) scheduled working days will be paid to attend the funeral. Funeral leave is paid at the Employee's base salary/hourly rate at eight (8) hours per day. These hours are not included in the calculation of overtime. Upon receiving notice of the death of a family member, the Employee should notify the supervisor of the relationship to the deceased and the time required to attend or to make arrangements for the funeral.

Voting Time

NPC, LLC encourages all employees to exercise their right to vote. Each employee will be given up to two (2) hours to vote if adequate non-working time is not available to vote. The two hours shall be compensated at the employee's regular rate of pay. Employee must provide two working days' notice to arrange voting time leave. Time off for voting is not used in calculating overtime pay.

Jury Duty/Serving as a Subpoenaed Witness

NPC, LLC will provide short term leaves of absence for the purpose of jury duty or testifying as a subpoenaed witness in a judicial proceeding. Employees shall request a leave of absence in writing as early as possible, providing a copy of the jury summons or witness subpoena along with the request. The Employee will be paid the difference between the Employee's normal salary/wage and the amount received by the Employee from the Court, provided that NPC, LLC will only pay such wage differential for a maximum of one week. Any leaves of absence for these purposes for longer than one week will be unpaid or charged against the Employee's PTO time.

Military Leave

Military leaves of absence will be provided to employees in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and applicable Georgia laws that protect individuals with military commitments from detrimental employment decisions based on those commitments. Military leaves of absence may be paid or unpaid leaves in accordance with the provisions of this policy and applicable law.

Unless giving notice is unreasonable or precluded by military necessity, employees requiring a military leave of absence should provide their supervisors with a written or verbal advance notice along with, if available, a copy of the military order. It is recommended that the notice be given to the supervisor at least two weeks before the military-leave-of-absence start date.

NPC, LLC may not insist on knowing exactly when the staff member will return to work; however, the staff member can be asked to furnish the approximate beginning and concluding dates of his or her training.

Absenteeism and Tardiness

Unscheduled, unexcused absence(s) due to injury or illness, even when following appropriate guidelines, may still be deemed excessive. Discipline, up to and including termination, for otherwise unexcused tardiness and absenteeism can be expected. Three working days of not calling and showing for work will be deemed voluntary abandonment of the Employee's position.

Unpaid Leaves of Absences

Other than the policies noted in this section, or as otherwise required by applicable law, NPC, LLC does not offer unpaid leaves of absences. Once a team member has exhausted all available paid or unpaid leave time provided herein, the team member's employment will be terminated, unless otherwise required by applicable law. As an alternative to termination, those team members otherwise in good standing may resign their employment and remain eligible for rehire as follows: NPC, LLC will classify the candidate as being eligible for rehire, but will not guarantee reinstatement. However, NPC, LLC will, at the team member's request, place them back into an available role they are otherwise qualified for, if possible, at the conclusion of their need for unpaid leave and/or release to return to work. NPC, LLC has a rehire policy which states that when we rehire a team member within six months of their separation date, the team member will retain their original hire date for tenure and PTO accrual purposes and restart benefits first of following month.

Assets

During employment with NPC, LLC, Employees may be issued one or more of the assets below. If so, any assets assigned to an Employee are done so with confidence that the Employee will care for the asset, and with the intent to enable the Employee to perform the functions with his or her job.

Laptop/Computer - A laptop or computer may be issued to Employees who require business software to perform their job. Employees who are issued a laptop or computer are expected to use the technology for NPC, LLC related business. Employees are expected to abide by all IT policies applicable to the asset.

Mobile Device - A cell phone or smart phone may be issued to Employees who require ability to remain in contact with NPC, LLC and other business partners to perform their job. Employees who are issued a cell phone or smart phone are expected to use the technology for NPC, LLC related business. Employees are expected to abide by all IT policies applicable to the asset.

Employer Provided Vehicle - An employer provided vehicle may be issued to Employees who require a vehicle to perform their job. Employees who are issued a vehicle are expected to use the vehicle for NPC, LLC related business. Employees are expected to abide by all Vehicle/Fleet/Safety policies applicable to the asset. Employees using the vehicle for any personal use should expect to account for personal mileage at the end of the year and to be responsible for any taxes on the percentage of personal use of the vehicle.

Fuel Card - A fuel card may be issued to Employees who require an employer provided vehicle, or who receive an auto allowance to perform their job. Employees who are issued a fuel card are expected to use the card for the purchase of fuel for NPC, LLC related business. Employees are expected to abide by all Vehicle/Fleet/Safety policies applicable to the asset. As a rule, only regular unleaded fuel should be purchased. Receipts for fuel purchases should be submitted on a weekly basis.

Motor Vehicle Accident Procedures - The operator of any NPC, LLC vehicle/equipment involved in any accident will ensure the incident is reported immediately to the appropriate personnel. An accident reporting kit is in each vehicle, located in the glove-box, with detailed instructions of how and to whom to report the accident/incident.

Employee Relations

Communication

Communication is the greatest asset that any organization can have. For this reason, NPC, LLC encourages all Employees to feel free to discuss any questions or problems they may have regarding existing policies or practices with their direct Supervisor. If an Employee feel that they have not received the necessary information, the Employee will have an opportunity to obtain the necessary assistance by speaking directly to the Supervisor of their direct Manager and the Human Resources Manager.

Employee Grievance Resolution

It is the policy of NPC, LLC to provide an internal process to assist Employees in resolving work-related issues, problems and complaints promptly and fairly without risk of any adverse reaction, retribution, or threat.

The recommended procedure for resolving Employee concerns is outlined below. Although Employees are encouraged to resolve issues at the level at which they occur, it is recognized that, due to the circumstances of certain issues, it may be necessary or preferable to involve higher levels of management and/or the Human Resources Manager.

- A. The Employee should discuss the concern with his or her Supervisor. The Supervisor should investigate and resolve the issue as quickly and confidentially as possible.
- B. If the above step is inappropriate, or the problem is not resolved, then the Employee should seek assistance from the next level of management.
- C. If the Employee is uncomfortable about taking a complaint to management or the issue is not resolved, then the Employee should register in writing the complaint with the Human Resources Manager within 30 workdays of the event at issue.
- D. The Human Resources Manager will involve all parties in a resolution process. During the process a final decision will be made as to appropriate action to be taken.
- E. Adverse action is strictly prohibited against any individual or group for registering, participating in, or cooperating with an investigation of discrimination.
- F. Responsibilities are outlined as follows:

Case 1:25-cv-00804-LMM Document 1-2 Filed 02/14/25 Page 10 of 14

- i. Employees All Employees are expected to, and have the obligation to, bring any valid, work-related complaints/issues to the appropriate level of management in an effort to help bring resolution to the matter in a timely, professional manner. It is the policy's intent that, when appropriate, issues are resolved at the level in which they occur before taking them to higher levels in the organization or beyond.
- ii. NPC, LLC Management It is the responsibility of the NPC, LLC's Management to ensure their own understanding and compliance of this policy as well as the understanding and compliance by their Employees. Additionally, it is also the responsibility of NPC, LLC's management to encourage and provide the means for effective, honest, and open channels of two-way communication between themselves and NPC, LLC's Employees.

G. Time Frames

i. An Employee may file a complaint with the Human Resources Manager within 30 workdays from the date of the occurrence of the issue that caused the dispute, or within 30 workdays of the date the Employee becomes aware of the issue in dispute. The Human Resources Manager has 20 calendar days to conduct a preliminary review of the complaint.

Discrimination Complaint Procedure

Any Employee or applicant for employment who believes that he or she has been subjected to or a witness to discrimination should immediately report the alleged act directly to his or her immediate supervisor. If an Employee does not feel comfortable reporting the matter to his or her immediate supervisor, the matter should be reported to NPC, LLC's EEO Officer, Michael Valdes, Human Resources Manager, at (404) 368-8472. The EEO Officer or a designate person will conduct an immediate and thorough investigation of all complaints in a discreet and confidential manner. The timeline for completion of the investigation is 30 days from the date the complaint is received. Employees who report claims of discrimination or sexual harassment shall be protected from any form of retaliatory action.

In addition, Employees and applicants have the right to file a complaint within 180 days with the Equal Employment Opportunity Commission.

Harassment Free Statement

NPC, LLC is committed to maintaining a working environment free from harassment, intimidation and coercion at all times. Employees are directed to contact their supervisor at once if they encounter a problem of this nature. If there is not a supervisor in the vicinity, contact the Human Resources Manager.

Sexual Harassment Prevention

No Employee in a supervisory or non-supervisory job or other third party is to indicate, through his or her actions, either explicitly or implicitly, that an Employee's submission to or rejection of sexual advances will influence decisions regarding that Employee's employment, wages, benefits, advancement, assigned duties, shifts, career development or other conditions of employment. Sexual harassment will result in disciplinary action up to and including termination and may lead to personal legal and financial liability as well.

For purposes of this policy, "sexual harassment" means any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of sexual nature when:

- · submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment; or
- submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or
- such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Employee Conduct, Performance, & Discipline

It is the duty and the responsibility of every Employee to be aware of and abide by existing policies and guidelines. It is also the responsibility of every Employee to perform his or her duties to the best of his or her ability and to the standards as set forth in his or her job summary or as otherwise established. NPC, LLC has established general guidelines to govern the conduct of its Employees in this manual; however, no guideline can include all instances of misconduct, which can result in discipline, and the guidelines herein do not replace sound judgment or common sense behavior. NPC, LLC reserves the right to determine the appropriate level of discipline for any inappropriate conduct, including but not limited to demotion, oral and written warning, suspension with or without pay, and termination.

General Management Practices

Standards of Business Ethics

NPC, LLC is committed to the highest standards of business conduct. NPC, LLC prospers by dealing fairly and honestly with Employees, clients, subcontractors, suppliers, competitors, the public, and other stakeholders. To support these principles, all Employees are responsible for making ethical judgments in all their business dealings and for conducting business in a matter consistent with these guidelines. Additionally, Employees are required to comply with the "Developer's Ethical Standards of Conduct Plan," which has been adopted by the Developer and approved by GDOT for use in the I-285 and GA 400 Reconstruction Project. A copy of the plan is available for review with employer bulletin board postings and through the Office Administrator.

- **Professional Integrity** Consistent with our operating principles, Employees should strive to conduct all business dealings and relationships with integrity, honesty, and respect for others. Relationships with customers, subcontractors, suppliers, competitors, and Employees are to be based on fair dealing, on fair competition in quality, price, and service, and on compliance with applicable laws and regulations.
- Accurate and Complete Accounting Employees should use NPC, LLC funds and other property solely for the benefit of the NPC, LLC. No unrecorded fund, reserve, asset, or special account shall be set up or maintained for any purpose. Employees are responsible for accurate and timely record keeping for all NPC, LLC assets, liabilities, revenues, and expenses.
- Bribes and Kickbacks NPC, LLC does not permit or condone bribes, kickbacks, or any other illegal, secret, or improper payments, transfers, or receipts. All payments and transfers of premium and other items of value to Employees of other business entities or to such entities themselves shall be made openly and must be disclosed and authorized in advance by the customer and NPC, LLC. No Employee shall offer, give, or transfer any money or anything else of value for the personal benefit of any Employee or agent of another business entity. No Employee shall assist in the misuse of NPC, LLC funds. No outside agent of any kind shall be used to circumvent the prohibition against bribes, kickbacks, and other illegal, secret, or improper payments.
- Gifts and Entertainment Except in connection with and specifically pursuant to programs officially authorized by NPC, LLC, Employees may not accept, directly or indirectly, any money, objects of value, or premiums from any person or company that has or is doing or seeking business with NPC, LLC. Employees may accept only business-related meals, entertainment, gifts, or favors when authorized by management and when the value involved is not significant and clearly will not create an obligation to the donor. Any payments or transactions must be accurately recorded in the NPC, LLC's books and records and must be consistent with applicable law and accepted practice in the community.
- Conflicts of Interest No Employee should use his or her position with NPC, LLC or information acquired during employment in a manner that may create a conflict, or the appearance of a conflict, between the Employee's personal interests and those of NPC, LLC. All activities conducted as an Employee of NPC, LLC should always place the lawful and legitimate interests of NPC, LLC over personal gain. Absent written authorization by NPC, LLC, no Employee shall be affiliated with any buyer, purchasing agent, or provider of goods or services to NPC, LLC. If an Employee has any reason to believe there may be a conflict of interest, he or she should immediately disclose the matter to an immediate supervisor or the Human Resources Manager.
- Confidentiality Except as properly authorized by NPC, LLC, it is the responsibility of all Employees to maintain the confidentiality of
 proprietary information of NPC, LLC and other information entrusted to NPC, LLC by customers that is otherwise not readily available to
 the public. Employees should refrain from discussing confidential NPC, LLC business with outsiders and with anyone else who does not have
 a legitimate need to know the information.
- Political and Charitable Contributions Although Employees are encouraged to be socially responsible and politically active, Employees may not contribute NPC, LLC funds or assets to any political candidates, party, charity, or similar organizations, unless such contribution is expressly permitted by law and has been pre-approved by the appropriate, authorized representative at the NPC, LLC.
- Administration of Business Ethics and Conduct All Employees who suspect violations of the letter or spirit of this policy have an obligation to report their concerns to the Human Resources Manager. All allegations of improper or illegal behavior will be investigated promptly and thoroughly. No adverse action shall be taken or permitted against anyone for communicating legitimate concerns to the appropriate persons. This policy is subject to amendment and may be reviewed and updated periodically.

Electronic Media Resources

The emergence of electronic media resources as key resources for business and communications within NPC, LLC dictates that each Employee takes responsibility in using these resources in an efficient, effective, and businesslike manner. Each Employee is responsible for his or her actions when using these Electronic Media Resources. Electronic Media Resources are important resources to be used to advance the NPC, LLC's business interests. Employees are encouraged to make use of these resources to efficiently handle the daily responsibilities of the job, and it is expected that Employees will do so in a manner that does not violate rights of NPC, LLC, co-workers or other persons or entities.

The use of electronic mail through the NPC, LLC network is primarily for business purposes. Incidental personal use of the electronic mail system is permitted. However, the personal use of e-mail should not interfere with NPC, LLC operations, nor should it cause any harm or embarrassment to NPC, LLC or its member-owners. Employees are expected to act legally and responsibly with respect to the storage of information on Electronic Media Resources. Employees are expected to be familiar with both the legal and policy requirements -- within their functional responsibility -- for record retention, or to ask their supervisors to obtain such information.

Employee Reference

It is the policy of NPC, LLC to protect its interests and the interests of its present and former Employees through the control of information released in response to reference inquiries. A reference inquiry is any written or oral request for information about a present or former Employee from any person, organization or government agency not connected with NPC, LLC. Only the Human Resources Department or the Legal Department may release information in response to outside reference inquiries. Management should instruct their staff to direct all outside reference inquiries to the Human Resources Department.

Solicitation and Distribution

To avoid distractions, solicitation by an employee of another employee is prohibited while either employee is on working time. "Working time" is the time an employee is engaged, or should be engaged, in performing his or her work tasks for NPC, LLC. Solicitation of any kind by non-employees on NPC, LLC premises is prohibited at all times. Distribution of advertising material, handbills, printed, written literature of any kind in in person or via email or phone communication systems or in working areas of the NPC, LLC is prohibited at all times. Distribution of literature by nonemployees on NPC, LLC premises is prohibited at all times.

Use of Social Media

NPC, LLC understands that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, NPC, LLC has established guidelines for appropriate use of social media.

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to an Employee's or others' web log or blog, journal or diary, personal web site, social networking or affinity web site, or web bulletin board or a chat room, whether or not associated or affiliated with NPC, LLC, as well as any other form of electronic communication. The same principles and guidelines found in NPC, LLC's policies and three basic beliefs apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects members, customers, suppliers, people who work on behalf of NPC, LLC's legitimate business interests may result in disciplinary action up to and including termination.

Carefully read this manual as well as any other policies distributed by NPC, LLC, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Express only your personal opinions. Never represent yourself as a spokesperson for NPC, LLC. Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your Supervisor. Do not use NPC, LLC email addresses to register on social networks, blogs or other online tools utilized for personal use.

Expense Reimbursement Policy

This policy is designed to assist employees in reporting expenses incurred while conducting NPC, LLC business activities.

NPC, LLC expects employees to act responsibly and professionally when incurring and submitting costs. The organization will reimburse employees for reasonable expenses on <u>pre-approved</u> business. This includes, for example, travel fares, accommodations, meals, tips, telephone and fax charges, and purchases made on behalf of the organization. Unusual expenses should be approved in advance through your direct supervisor who should also seek approval through the CEO.

NPC, LLC does not pay for local travel to and from the office. If employees use their vehicles for business travel, mileage will be reimbursed as per the Treasury Board Guidelines and for appropriate parking fees. NPC, LLC will not be responsible for fuel, maintenance, traffic or parking violations.

General guidelines

Original receipts are required for reimbursement of all expenses except for per diems. These expenses include:

- Original boarding passes for airplane / train travel
- Credit card receipts
- Detailed merchant receipts

Receipts must be accompanied by a summary which outlines:

- The nature of the expense
- The name and titles of the individuals involved
- The purpose for the expense

Expense summaries must be submitted with receipts and approved by the employee immediate supervisor.

All expenses and summaries must be submitted within 30 days of the expenses to the Accounting Department for payment.

Travel guidelines

Employees are encouraged to fly coach class with the lowest available airfare for non-stop travel. If a car rental is required, employees are requested to rent mid-sized or compact vehicles. Employees will be reimbursed for the fuel costs associated with renting a vehicle.

Employees will be reimbursed for reasonable hotel accommodations. Discounted room rates should be requested at the time of room booking.

The following list includes examples of **non-reimbursable** expenses:

- Personal travel insurance
- Personal reading materials
- Childcare
- Toiletries, cosmetics, or grooming products
- Expenses occurred by spouses, children, or relatives
- In-room movies or video games
- Sporting activities, shows, etc.

How to order a flight, rental car, etc.

Employees are to book all travel through the appointed travel agency. Employees should contact the CFO with sufficient advance notice to book with the travel agency.

Any questions related to the content of this policy or its interpretation should be directed to the Human Resources Department.

Authorization, Approval, and Acknowledgement

Motor Vehicle Report Approval *Page 2 of Policy Guide (Safe Driver Requirements)
North Perimeter Contractors, LLC has permission to request a copy of my Motor Vehicle Report from the State for the purpose of employment, when necessary.
At-Will Employment *Page 1 of Policy Guide
I,, understand that my employment with North Perimeter Contractors, LLC is at
and may be terminated at any time, for any reason, with or without cause, with or without notice, by either the North Perimeter Contractors, LL me.
Substance Abuse Acknowledgement *Page 2 of Policy Guide
I,, have received, read and understand North Perimeter Contractors, LLC "Substa
Abuse Policy". If I have any questions, I will ask my supervisor, manager, or Human Resources Representative to explain them to me.
Harassment Free Environment Acknowledgement *Page 9 of Policy Guide
I,, have read and understand the North Perimeter Contractors, LLC harassment
statement.
Equal Employment Opportunity Acknowledgement *Page 3 of Policy Guide
I,, have received a copy of North Perimeter Contractors, LLC's "EEO Policy". I h
read it and, if I have any questions, I will ask my supervisor, manager, or Human Resources Representative.
Employee Grievance Resolution Policy & Procedure Acknowledgement *Page 8 of Policy Guide
I,, have received a copy of North Perimeter Contractors, LLC "Employee Grieva
Resolution Policy & Procedure". I will read the North Perimeter Contractors, LLC work rules and if I do not understand, I will ask my supervi
manager, or Human Resources Representative to explain.
Employee Conduct, Performance, & Discipline Acknowledgement *Page 9 of Policy Guide
I,, have received a copy of North Perimeter Contractors, LLC "Employee Cond
Performance, & Discipline". I will read the North Perimeter Contractors, LLC work rules and if I do not understand, I will ask my supervisor, mana
or Human Resources Representative to explain.
Automatic Payroll Deduction Authorization for Lost, Damaged or Destroyed Equipment
I,, hereby authorize North Perimeter Contractors, LLC to deduct from my paych
the total amount of charged resulting from the repair or replacement of any North Perimeter Contractors, LLC equipment lost, damaged or destro
by me because of my recklessness, carelessness or intentional acts or admissions. I understand North Perimeter Contractors, LLC will provide
with a list of items, which have been lost, damaged or destroyed by me and the amounts that are to be deducted from my paycheck for the ite
replacement or repair. After my review of the itemized list and damages, if any charges are found to be in error, any incorrect charges will be cred
to me. If I have any questions, I will ask my supervisor, manager, or Human Resources Representative to explain them to me.
I have received the handbook, and I understand that it is my responsibility to r
and comply with the policies contained in this handbook and any revisions made to it. These authorizations shall be in effect for as long as I and
Employee of North Perimeter Contractors, LLC.
Signature: Date:
Print Namo
Print Name: